BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268–0001

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POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

MOTION FOR LATE ACCEPTANCE OF RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORIES OCA/USPS-T36-12-13, 15(a), and 17(h)

The United States Postal Service hereby moves for late acceptance of its response to interrogatories OCA/USPS-T36-12-13, 15(a), and 17(h), filed on October 1, 2001. The response was due on October 15, 2001, and is thus 1 business day late. This delay was caused by a misunderstanding by the undersigned counsel regarding the procedures for responding to redirected interrogatories. The Postal Service regrets any inconvenience but does not believe that any party has been prejudiced by this delay.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Joseph K. Moore

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–3078, Fax –5402 October 16, 2001

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

øseph K. Moore

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 October 16, 2001